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March 8, 2019

VIA ECF AND HAND DELIVERY

Hon. Richard M. Berman
United States District Judge,
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: United States v. Owens, et al., 18 Cr. 693 (RMB)

Dear Judge Berman:

We have entered appearances on behalf of Harald Joachim von der Goltz in this matter and write in advance of the conference scheduled for Tuesday, March 12 at 11:00 am. As the Court is aware, last month Mr. von der Goltz voluntarily consented to extradition from the United Kingdom. Earlier this week, the UK authorities formally approved the extradition, and we understand that the government is coordinating with their counterparts in the United Kingdom to bring Mr. von der Goltz to the United States consistent with the process dictated by statute. It appears unlikely, however, that Mr. von der Goltz would arrive in the United States in time for Tuesday's conference.

Notwithstanding Mr. von der Goltz's absence, we respectfully request that the Court permit his counsel to appear at and participate in Tuesday's conference. The government has begun providing us discovery in anticipation of Mr. von der Goltz's arrival, and we respectfully submit that our participation in the conference on his behalf will help avoid unnecessary delay in the proceedings. Mr. von der Goltz consents to our participation in his absence.

We have conferred with counsel for the government and for Defendant Richard Gaffey, and neither objects to this request.

Respectfully submitted,

/s/ William A. Burck
William A. Burck

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